



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 10

1200 Sixth Avenue, Suite 900
Seattle, Washington 98101-3140

DEC 3 2015

OFFICE OF
COMPLIANCE AND ENFORCEMENT

Reply To: OCE-101

CERTIFIED MAIL -- RETURN RECEIPT REQUESTED

Shirley Yap
General Manager
Puget Sound Refinery
Shell Oil Products U.S.
P.O. Box 622
Anacortes, Washington 98221

Re: Request for Information Regarding the Facility located at 8505 South Texas Road, Anacortes, WA

Dear Ms. Yap:

The U.S. Environmental Protection Agency, Region 10 (EPA) is seeking information and documents relating to the environmental conditions at the facility located at 8505 South Texas Road, Anacortes, WA.

EPA is requesting additional information after a Risk Management Program inspection that was conducted the week of August 10, 2015. Pursuant to the authority of Section 114 of the Clean Air Act (CAA), 42 U.S.C. § 7414, you are hereby requested to respond to the Information Request.

In the Information Request (Enclosure 1), EPA requests information concerning the presence and amount of CAA § 112(r) regulated substances. A list of CAA § 112(r) regulated substances is provided in Enclosure 2.

The enclosed Statement of Certification (Enclosure 3) should be signed by a duly authorized officer or agent and returned with the response to this Information Request.

While EPA seeks your voluntary cooperation in this investigation, compliance with the Information Request is required by law. Failure to provide complete and truthful responses to this Information Request within **thirty (30) days** of your receipt of the request, or to adequately justify such failure to respond, may subject you to an enforcement action by EPA pursuant to § 113(a)(3) of the CAA. The statute permits EPA to seek the imposition of penalties of up to \$37,500 for each day of non-compliance.

Please note that responses which are incomplete, ambiguous, or evasive may be treated as non-compliance with the Information Request. If you believe a question is not applicable to the facility, explain in detail the reason for that belief. Please be further advised that provision of false, fictitious, or fraudulent statements of representations may subject you to criminal penalties under 18 U.S.C. § 1001 or Section 113(c)(2) of the CAA, 42 U.S.C. § 7413(C)(2).

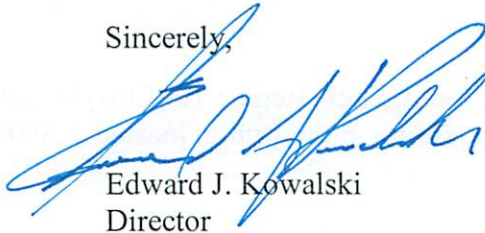
A complete copy of all responses should be sent to:

Javier Morales
U.S. EPA, Region 10
1200 Sixth Avenue, Suite 900, OCE-101
Seattle, Washington 98101

Due to the legal ramification of your failure to respond properly and promptly, EPA strongly encourages you to give this matter your immediate attention and to respond to this Information Request within the time frame specified above, unless prior to the date, you send a written request and receive approval from EPA for an alternate date. If you have any legal or technical questions relating to this Information Request, you may consult with EPA.

If you have any questions regarding this request, please contact Javier Morales in the Office of Compliance and Enforcement at (206) 553-1255 for CAA technical matters, or Shirin Gallagher in the Office of Regional Counsel at (206) 553-4196 for legal matters.

Sincerely,

A handwritten signature in blue ink, appearing to read "Edward J. Kowalski", is written over the typed name and title.

Edward J. Kowalski
Director

Enclosures

1. CAA Section 112(r) Information Request
2. Threshold Quantities for CAA Section 112(r)
3. Statement of Certification

Enclosure 1
CAA Section 112(r) Information Request

A. INSTRUCTIONS

1. Please provide a separate narrative response to each question and subpart of a question set forth in this Information Request, with the number of the question to which it corresponds. A complete set of all responses should be sent to the following address:

Javier Morales
U.S. EPA Region 10
1200 Sixth Avenue, Suite 900, OCE-101
Seattle, WA 98101

2. For each question contained herein, identify each document consulted, examined, or referred to in the preparation of the response or that contains information responsive to the question, and provide a true and correct copy of each such document if not provided in response to another specific request herein.
3. Indicate on each document produced in response to this Information Request, or in another reasonable manner, the number of the question to which it corresponds.
4. If requested information or documents are not known or are not available to you at the time of your response to this Information Request, but later become known or available to you, you must supplement your response to EPA. Moreover, should you find at any time after submission of your response that any portion is or becomes false, incomplete, or misrepresents the facts, you must provide EPA with a corrected response as soon as possible.
5. The information requested herein must be provided whether or not you regard part or all of it as a trade secret or confidential business information. You may, if you desire, assert a business confidentiality claim covering all or part of the information submitted pursuant to Section 114 of the Clean Air Act, 42 U.S.C. § 7414, and 40 C.F.R. Part 2, by labeling such information at the time it is submitted to EPA as "trade secret" or "proprietary" or "company confidential" or other suitable notice.

The information covered by such a claim will be disclosed by EPA only to the extent and by the procedures set forth in statutes and 40 C.F.R. Part 2, Subpart B. Additional rules governing certain information obtained under the CAA appear in 40 C.F.R. § 2.301. Unless you make a claim at the time that you submit the information in the manner described in 40 C.F.R. § 2.203(b), it may be made available to the public by EPA without further notice to you. You should read 40 C.F.R. Part 2 carefully before asserting a business confidentiality claim, since certain categories of information are not properly the subject of such a claim.

B. DEFINITIONS

The following definitions apply to this Information Request. All terms not defined herein shall have their ordinary meaning unless such terms are defined in the Clean Air Act or in the regulations at 40 C.F.R. Part 68.

1. The "company" refers to either the owner or operator of the facility, or both. If a question would have a different response because the owner and operator are different entities, the response shall be made in relation to both.
2. The term "document" means any object that records, stores, or presents information, and includes writings, records, or information of any kind, formal or informal, whether wholly or partially handwritten or typed, whether in computer format, memory, or storage device, or in hard copy,

including any form or format of these. If in computer format or memory, each such document shall be provided in translation to a form useable and readable by EPA, with all necessary documentation and support. All documents in hard copy should also include: (a) any copy of each document which is not an exact duplicate of a document which is produced, (b) each copy which has any writing, notation, or the like on it, (c) drafts, (d) attachments to or enclosures with any document, and (e) every other document referred to or incorporated into each document.

3. The terms "identify" and "describe" mean, with respect to a corporation, partnership, business trust, or other association or business entity (including a sole association or sole proprietorship), to set forth its full name; address, legal form (e.g., corporation, partnership, etc.), registered agent, organization, if any, and a brief description of its business.
4. The terms "identify" and "describe" mean, with respect to a natural person, to set forth the person's name, present or last known business address and business telephone number, present or last known home address and home telephone number, and present or last known job title, position, or business.
5. The terms "identify" and "describe" mean, with respect to a document, to provide its customary business description, its date, its number, if any (catalog, index, storage, invoice or purchase order number), the identity of the author, addressor, addressee and/or recipient, the substance, and the subject matter.
6. The terms "person" or "entity" shall have the same definition as "person" as defined in Section 302(e) of the Clean Air Act, and shall include any individual, association, corporation, partnership, or any federal, state, or local governmental entity.
7. The terms "you" or "Respondent" mean the addressee of this Request, and the addressee's subsidiaries, divisions, officers, directors, managers, employees, contractors, trustees, partners, successors, assigns, attorneys, and agents, as applicable.
8. The terms "and" and "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of this information request any information which might otherwise be construed to be outside its scope.
9. The term "vessel," as defined in 40 C.F.R. § 68.3, means any reactor, tank, drum, barrel, cylinder, vat, kettle, boiler, pipe, hose, or other container.
10. The term "regulated substance," as defined in 40 C.F.R. § 68.3, means any substance listed pursuant to Section 112(r)(3) of the Clean Air Act as amended in 40 C.F.R. § 68.130. Enclosure 2 provides this list of regulated substances and their threshold quantities.
11. The term "process," as defined in 40 C.F.R. § 68.3, means any activity involving a regulated substance including any use, storage, manufacturing, handling, or on-site movement of such substances, or combination of these activities. For the purposes of this definition, any group of vessels that are interconnected, or separate vessels that are located such that a regulated substance could be involved in a potential release, shall be considered a single process.
12. The term "process equipment" means all equipment used in the process.
13. The term "stationary source," as defined in 40 C.F.R. § 68.3, means any buildings, structures, equipment, installations, or substance emitting stationary activities which belong to the same industrial group, which are located on one or more contiguous properties, which are under the control of the same person (or persons under common control), and from which an accidental release may occur. The term stationary source does not apply to transportation, including storage incident to transportation, of any regulated substance or any other extremely hazardous substance under the provisions of 40 C.F.R. Part 68. A stationary source includes transportation containers

used for storage not incident to transportation and transportation containers connected to equipment at a stationary source for loading or unloading. Transportation includes, but is not limited to, transportation subject to oversight or regulation under 49 C.F.R. Parts 192, 193, or 195, or a state natural gas or hazardous liquid program for which the state has in effect a certification to Department of Transportation under 49 U.S.C. Section 60105. A stationary source does not include naturally occurring hydrocarbon reservoirs. Properties shall not be considered contiguous solely because of a railroad or pipeline right-of-way.

14. The term “threshold quantity,” as defined in 40 C.F.R. § 68.3, means the quantity specified for regulated substances pursuant to Section 112(r)(5) of the Clean Air Act as amended, listed in 40 C.F.R. § 68.130 and determined to be present at a stationary source. A threshold quantity of a regulated substance listed in 40 C.F.R. § 68.130 is present at a stationary source if the total quantity of the regulated substance contained in a process exceeds the threshold. For the purposes of determining whether more than a threshold quantity of a regulated substance is present at the stationary source, the exemptions in 40 C.F.R. § 68.115 apply. Enclosure 2 provides this list of regulated substances and their threshold quantities.
15. The term “Risk Management Plan” means the plan required by 40 C.F.R. Part 68, Subpart G if a stationary source has more than a threshold quantity of a regulated substance in a process.
16. The term “facility” means the property owned or operated by Shell Oil Products U.S. located at 8505 South Texas Road, Anacortes, Washington.
17. The term “covered process” means a process that has a regulated substance present in more than a threshold quantity as determined under 40 C.F.R. § 68.115.
18. The term “maximum intended inventory” means the maximum quantity of a regulated substance in a process greater than the threshold quantity listed in 40 C.F.R. § 68.130.
19. The term “flammable mixture” means a regulated substance is present in a mixture with a National Fire Protection Association (NFPA) flammability hazard rating of 4.
20. The term “East, South, and North Flare System” means the three flares that are tied together.
21. The term “worst-case relieving scenario” means the maximum amount of material moving through the flare system as well as resulting in some heavier hydrocarbons, which would maximize the liquid that accumulates in the flare gas recovery vessels.
22. The term “battery limit” means an area in a refinery encompassing a processing unit or battery of units along with their related utilities and services.
23. Words in the singular shall be construed in the plural, and vice versa, where appropriate in the context of a particular question or questions.

C. INFORMATION REQUEST

Provide the following information for the facility. Unless otherwise specified, provide all responsive information from the time period between December 1, 2010 and the date of this Information Request.

1. Identify the legal owner of the facility. If the owner and operator of the facility is not the same entity, identify the operator of the facility and provide contracts/legal documents between entities as they relate to ownership, purchase or buy-back agreements and contract operation.
2. Provide the name of the facility, as used by the owner and operator, and the street and mailing addresses for the facility.

3. Explain how the maximum intended inventories of the flammable mixture were calculated for the East, South, and North Flare System. Provide supporting documentation, including the maximum intended inventory calculations.
4. Describe the composition of chemicals in the flammable mixture by weight percent in the East, South, and North Flare System. Provide supporting documentation.
5. Describe and list the process equipment and piping circuits for the East, South, and North Flare System including the dimensions and volume of the process vessels and piping circuits. For each process vessel, indicate if it is oriented horizontally or vertically. Provide supporting documentation.
6. Describe the operating pressures and temperatures of the process equipment and piping circuits for the East, South, and North Flare System. Provide supporting documentation.
7. Provide accurate and up-to-date piping and instrumentation diagrams (P&IDs) for the East, South, and North Flare System as required by 40 C.F.R. § 68.65(d). If existing P&IDs do not represent a current configuration or rate, so state and provide current configurations and rates where appropriate.
8. Provide an accurate and up-to-date plot diagram, site plan, or drawings showing the location of the East, South, and North Flare System including the location of the piping and process equipment of the flares connected or adjacent to the other refinery processes.
9. Explain the flare studies conducted for the East, South, and North Flare System including the worst-case relieving scenarios and the battery limits. Provide supporting documentation.
10. Explain how you determined that the East, South, and North Flare System was not a covered process subject to 40 C.F.R. Part 68. Provide supporting documentation.

Enclosure 2
Threshold Quantities for CAA Section 112(r)

CAS #	Regulated Substance	TQ (Lbs)	TQ (CF)	TQ (Gal)
107-02-8	Acrolein	5,000		717
107-13-1	Acrylonitrile	20,000		3,012
814-68-6	Acrylyl chloride	5,000		
107-18-6	Allyl alcohol	15,000		2,126
107-11-9	Allylamine	10,000		1,798
7664-41-7	Ammonia (anhydrous)	10,000	415,600	1,565
7664-41-7	Ammonia (\geq conc. 20%)	20,000		3,912
7784-34-1	Arsenous trichloride	15,000		841
7784-42-1	Arsine	1,000	5,000	45
10294-34-5	Boron trichloride	5,000	16,500	816
7637-07-2	Boron trifluoride	5,000	28,000	384
353-42-4	Boron trifluoride compound with methyl ether (1:1)	15,000		1,238
7726-95-6	Bromine	10,000		386
75-15-0	Carbon disulfide	20,000		1,854
7782-50-5	Chlorine	2,500	41,239	193
10049-04-4	Chlorine dioxide	1,000	41,239	80
67-66-3	Chloroform	20,000		1,618
542-88-1	Chloromethyl ether	1,000		564
107-30-2	Chloromethyl methyl ether	5,000		
4170-30-3	Crotonaldehyde	20,000		2,935
123-73-9	Crotonaldehyde, (E)-	20,000		2,802
506-77-4	Cyanogen chloride ((CN)Cl)	10,000	280,266	1,004
108-91-8	Cyclohexylamine	15,000		2,077
19287-45-7	Diborane	2,500	35,125	
75-78-5	Dimethyldichlorosilane	5,000		560
57-14-7	1,1-Dimethylhydrazine	15,000		2,285
106-89-8	Epichlorohydrin	20,000		2,037
107-15-3	Ethylenediamine	20,000		2,677
151-56-4	Ethyleneimine	10,000		1,448
75-21-8	Ethylene oxide	10,000	87,800	1,385
7782-41-4	Fluorine	1,000	10,170	109
50-00-0	Formaldehyde (solution)	15,000		2,217
110-00-9	Furan	5,000		644
302-01-2	Hydrazine	15,000		1,800
7647-01-0	Hydrochloric acid (\geq conc. 37%)	15,000		1,689
74-90-8	Hydrocyanic acid/Hydrogen cyanide	2,500		437
7647-01-0	Hydrogen chloride (anhydrous)	5,000	54,500	475
7664-39-3	Hydrogen fluoride/Hydrofluoric acid (\geq conc. 50%)	1,000		105
7783-07-5	Hydrogen selenide	500		28
7783-06-4	Hydrogen sulfide	10,000	266,920	1,017
13463-40-6	Iron, pentacarbonyl-	2,500		202
78-82-0	Isobutyronitrile	20,000		3,171
108-23-6	Isopropyl chloroformate	15,000		
126-98-7	Methacrylonitrile	10,000		1,506
74-87-3	Methyl chloride	10,000	75,000	1,310
79-22-1	Methyl chloroformate	5,000		493
60-34-4	Methyl hydrazine	15,000		2,068

Abbreviations: TQ – Threshold Quantity, Lbs - Pounds, CF - Cubic Feet & Gal – Gallons

Enclosure 2
Threshold Quantities for CAA Section 112(r)

CAS #	Regulated Substance	TQ (Lbs)	TQ (CF)	TQ (Gal)
624-83-9	Methyl isocyanate	10,000		1,255
74-93-1	Methyl mercaptan	10,000	116,110	1,385
556-64-9	Methyl thiocyanate	20,000		
75-79-6	Methyltrichlorosilane	5,000		473
13463-39-3	Nickel carbonyl	1,000		91
7697-37-2	Nitric acid (>= conc. 80%)	15,000		1,202
10102-43-9	Nitric oxide	10,000	130,000	949
8014-95-7	Oleum (fuming sulfuric acid)	10,000		
79-21-0	Peracetic acid	10,000		1,048
594-42-3	Perchloromethyl mercaptan	10,000		700
75-44-5	Phosgene	500	1,950	43
7803-51-2	Phosphine	5,000	79,008	508
10025-87-3	Phosphorus oxychloride	5,000		359
7719-12-2	Phosphorus trichloride	15,000		
110-89-4	Piperidine	15,000		2,097
107-12-0	Propionitrile	10,000		1,545
109-61-5	Propyl chloroformate	15,000		
75-55-8	Propyleneimine	10,000		1,506
75-56-9	Propylene oxide	10,000		1,403
7446-09-5	Sulfur dioxide (anhydrous)	5,000	29,950	413
7783-60-0	Sulfur tetrafluoride	2,500		
7446-11-9	Sulfur trioxide	10,000		628
75-74-1	Tetramethyllead	10,000		604
509-14-8	Tetranitromethane	10,000		735
7550-45-0	Titanium tetrachloride	2,500		175
584-84-9	Toluene 2,4-diisocyanate	10,000		984
91-08-7	Toluene 2,6-diisocyanate	10,000		
26471-62-5	Toluene diisocyanate			
	(mixed isomers)	10,000		984
75-77-4	Trimethylchlorosilane	10,000		1,401
108-05-4	Vinyl acetate monomer	15,000		1,407
75-07-0	Acetaldehyde	10,000		1,545
74-86-2	Acetylene	10,000	147,000	1,950
598-73-2	Bromotrifluoroethylene	10,000		
106-99-0	1,3-Butadiene	10,000	69,000	1,854
106-97-8	Butane	10,000	63,356	2,008
106-98-9	1-Butene	10,000	65,510	272
107-01-7	2-Butene	10,000		
25167-67-3	Butene	10,000		
590-18-1	2-Butene-cis	10,000	65,230	259
624-64-6	2-Butene-trans	10,000	65,245	267
463-58-1	Carbon oxysulfide	10,000	280,266	574
7791-21-1	Chlorine monoxide	10,000		
557-98-2	2-Chloropropylene	10,000		1,279
590-21-6	1-Chloropropylene	10,000		1,279
460-19-5	Cyanogen	10,000	241,082	
75-19-4	Cyclopropane	10,000	100,762	1,673
4109-96-0	Dichlorosilane	10,000	464,441	
75-37-6	Difluoroethane	10,000	57,400	502
124-40-3	Dimethylamine	10,000	86,000	1,772

Abbreviations: TQ – Threshold Quantity, Lbs - Pounds, CF - Cubic Feet & Gal – Gallons

Enclosure 2
Threshold Quantities for CAA Section 112(r)

CAS #	Regulated Substance	TQ (Lbs)	TQ (CF)	TQ (Gal)
463-82-1	2,2-Dimethylpropane	10,000	78,875	
74-84-0	Ethane	10,000	125,151	2,677
107-00-6	Ethyl acetylene	10,000	72,000	1,792
75-04-7	Ethylamine	10,000		1,754
75-00-3	Ethyl chloride	10,000	44,042	1,310
74-85-1	Ethylene	10,000	127,000	2,114
60-29-7	Ethyl ether	10,000		1,697
75-08-1	Ethyl mercaptan	10,000		
109-95-5	Ethyl nitrite	10,000		
1333-74-0	Hydrogen	10,000	1,920,000	16,900
75-28-5	Isobutane	10,000	63,355	2,077
78-78-4	Isopentane	10,000		1,943
78-79-5	Isoprene	10,000		1,769
75-31-0	Isopropylamine	10,000		1,746
75-29-6	Isopropyl chloride	10,000		1,398
74-82-8	Methane	10,000	236,113	2,175
74-89-5	Methylamine	10,000	121,000	1,336
563-45-1	3-Methyl-1-butene	10,000	83,706	879
563-46-2	2-Methyl-1-butene	10,000		
115-10-6	Methyl ether	10,000	88,217	1,823
107-31-3	Methyl formate	10,000		1,229
115-11-7	2-Methylpropene	10,000	80,076	2,000
504-60-9	1,3-Pentadiene	10,000		1,828
109-66-0	Pentane	10,000		1,923
109-67-1	1-Pentene	10,000		1,883
646-04-8	2-Pentene, (E)-	10,000		1,883
627-20-3	2-Pentene, (Z)-	10,000		1,883
463-49-0	Propadiene	10,000		
74-98-6	Propane	10,000	84,515	2,358
115-07-1	Propylene	10,000	88,750	2,362
74-99-7	Propyne	10,000	97,000	
7803-62-5	Silane	10,000	120,000	1,772
116-14-3	Tetrafluoroethylene	10,000		
75-76-3	Tetramethylsilane	10,000		1,859
10025-78-2	Trichlorosilane	10,000		1,012
79-38-9	Trifluorochloroethylene	10,000	174,165	898
75-50-3	Trimethylamine	10,000	64,000	1,812
689-97-4	Vinyl acetylene	10,000	91,647	1,939
75-01-4	Vinyl chloride	10,000	62,500	1,316
109-92-2	Vinyl ethyl ether	10,000		1,321
75-02-5	Vinyl fluoride	10,000		1,557
75-35-4	Vinylidene chloride	10,000		
75-38-7	Vinylidene fluoride	10,000	82,345	1,946
107-25-5	Vinyl methyl ether	10,000	100,095	1,600

Abbreviations: TQ – Threshold Quantity, Lbs - Pounds, CF - Cubic Feet & Gal – Gallons

Enclosure 3

Puget Sound Refinery
Shell Oil Products U.S.
P.O. Box 62
Anacortes, WA 98221

INFORMATION REQUEST
STATEMENT OF CERTIFICATION

I certify that the enclosed responses to EPA's Information Request issued to Puget Sound Refinery, Shell Oil Products U.S. are true, accurate, and complete. I certify that the portions of these responses which I did not personally prepare were prepared by persons acting on behalf of Puget Sound Refinery, Shell Oil Products U.S. under my supervision and at my instruction, and that the information provided is true, accurate, and complete. I am aware that there are significant penalties for submitting false information in response to this Information Request, including the possibility of fine and imprisonment.

Signature

Printed Name

Title

Date